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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C., 20554

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WASHINGTON, D.C. 20554

In the Matter of )  
Telephone Number Portability ) CC Docket No. 95-116

**NEXTLINK CALIFORNIA, L.L.C.'s PETITION FOR LIMITED WAIVER  
OF THE IMPLEMENTATION DEADLINE FOR NUMBER PORTABILITY  
IN THE LOS ANGELES METROPOLITAN STATISTICAL AREA**

NEXTLINK California, L.L.C. ("NEXTLINK"), pursuant to 47 C.F.R. 52.3(e), hereby requests a waiver of the Commission's rules requiring implementation of permanent local number portability in the Los Angeles Metropolitan Statistical Area ("MSA") by March 31, 1998. NEXTLINK seeks an extension of time within which to deploy permanent local number portability in the Los Angeles MSA until July 1, 1998 as a result of delays in the availability of the vendor-supplied Number Portability Administration Center/Service Management System in the West Coast region. As set forth below, special circumstances beyond NEXTLINK's control warrant NEXTLINK's requested deviation from the Phase I implementation schedule in the Los Angeles MSA.

**I. Background**

The Commission, in its First Report and Order in this proceeding, delegated to the Chief of the Common Carrier Bureau "the authority to waive or stay any of the dates in the implementation schedule, as the Chief determines is necessary to ensure the efficient development of number portability." *In re Matter of Telephone Number Portability*, CC Docket No. 95-116, First Report and Order and Notice of Proposed Rulemaking, 11 FCC

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Rcd 8352, 8393 (1996). The Commission subsequently established in its Order on Reconsideration in this docket a deadline of March 31, 1998 for implementation of permanent local number portability in the largest seven MSAs, including Los Angeles (“Phase I”).

In a letter dated January 21, 1998, from the Chairman of the North American Numbering Council (“NANC”) to the Chief of the Common Carrier Bureau, NANC advised the Commission that the Phase I implementation schedule for deployment of local number portability would be “significantly affected in the Southeast, Western, and West Coast regions by vendor failure to provide a stable platform to support local number portability.”<sup>1</sup> The problems with Perot Systems Corporation, the vendor chosen to provide the Number Portability Administration Center (“NPAC”) in these three regions, were thoroughly detailed in a joint letter dated January 23, 1998 to the Chief of the Common Carrier Bureau from the Chairman of West Coast Portability Service, LLC (the “West Coast LLC”) and the President of the Southeast Region Number Portability Administration Company, LLC (the “joint letter”).<sup>2</sup> Recognizing the NPAC vendor problems and delays being experienced in the Southeastern, West Coast, and Western regions, the Commission by Order released on January 28, 1998 held that carriers affected by such problems would have until March 2, 1998 to seek a waiver of the Phase I deadline.

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<sup>1</sup> Letter, from Alan Hasselwander, Chairman, North American Numbering Council, to Richard Metzger, Chief, Common Carrier Bureau (January 21, 1998).

<sup>2</sup> Letter, from Richard Scheer, Chairman of West Coast Portability Service, LLC, and Pamela Connell, President of the Southeast Region Number Portability Administration Company, LLC, to Richard Metzger, Chief, Common Carrier Bureau (January 23, 1998).

## **II. Circumstances Warranting NEXTLINK's Request for a Waiver of the Number Portability Implementation Deadline in Los Angeles**

NEXTLINK, a facilities-based competitive local exchange carrier, provides telecommunications services in numerous municipalities in California, including Los Angeles. As set forth below, NEXTLINK will be unable to deploy long term number portability in the Los Angeles MSA by the March 31<sup>st</sup> deadline established by the Commission due to circumstances beyond the company's control.

As a result of the NPAC problems detailed in the January 23<sup>rd</sup> joint letter, the West Coast LLC terminated its contract with Perot. The LLC recently chose Lockheed Martin IMS to replace Perot as the NPAC vendor for the West Coast region in order to accelerate roll-out of the NPAC in the region. Nevertheless, the NPAC will not be in place in time to allow local exchange carriers ("LECs") in the Los Angeles MSA to deploy permanent local number portability by the March 31, 1998, Phase I deadline.

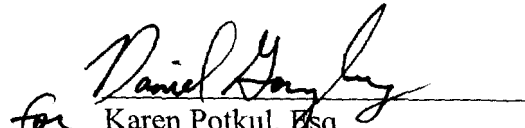
NEXTLINK has learned that Lockheed will have the NPAC in the West Coast region up and running by May 13, 1998. At that time, LECs operating in the Los Angeles MSA should be able to begin cooperative, inter-company end-to-end testing of local number portability. NEXTLINK estimates that such testing should last approximately thirty days. Upon completion of the inter-company, end-to-end testing, the LECs in the Los Angeles MSA, including NEXTLINK, can begin a phased, central office by central office conversion to permanent local number portability. NEXTLINK estimates that this conversion should be completed by July 1, 1998. Accordingly,

NEXTLINK seeks an extension of the deadline in which to deploy permanent number portability in the Los Angeles MSA until July 1, 1998.

### **III. Conclusion**

For the foregoing reasons, NEXTLINK will be unable to meet the Commission's March 31, 1998 deadline for implementation of permanent local number portability in the Los Angeles MSA. Because the circumstances precluding NEXTLINK from meeting this deadline are entirely beyond NEXTLINK's control, NEXTLINK respectfully requests that the Commission waive its rules and extend the deadline for NEXTLINK's deployment of permanent local number portability in the Los Angeles MSA from March 31 to July 1, 1998.

Respectfully Submitted,

  
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